EXHIBIT A

From: Roland Tellis <rtellis@baronbudd.com>
Sent: Monday, February 17, 2025 5:53 PM

To: Heller, Nathan

Cc: DSTELLINGS@lchb.com; Goldberg, Matthew A.; Pfenninger, Timothy; Eric Kizirian;

Keramidas, Mike

Subject: Re: ARC MDL -- JX Discovery Motion as to Porsche AG & BMW AG



EXTERNAL MESSAGE

A week for both of us is fine.

On Feb 17, 2025, at 1:46 PM, Heller, Nathan < Nathan. Heller@us.dlapiper.com > wrote:

Members of our team are traveling overseas for depositions this week, which makes the preparation of drafts and review with our client a logistical challenge. Additionally, the subject matter of the discovery motion overlaps with the issues raised in the motion to dismiss and plaintiffs' opposition. We are seeking to align the deadlines so that both the reply to the MTD and the opposition to the discovery motion are submitted together given the related subject matter.

We're happy to agree to an additional week for plaintiffs' reply to the jurisdictional motion.

Will plaintiffs consent to the request?

Nathan P. Heller

Of Counsel

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DLA Piper LLP (US) dlapiper.com

From: Roland Tellis < rtellis@baronbudd.com> Sent: Monday, February 17, 2025 3:39 PM

To: Heller, Nathan < Nathan.Heller@us.dlapiper.com>; dstellings@lchb.com

Cc: Goldberg, Matthew A. <Matthew.Goldberg@us.dlapiper.com>; Pfenninger, Timothy

<Timothy.Pfenninger@us.dlapiper.com>; Kizirian, Eric <eric.kizirian@lewisbrisbois.com>; Keramidas,

Mike <mike.keramidas@us.dlapiper.com>

Subject: Re: ARC MDL -- JX Discovery Motion as to Porsche AG & BMW AG

▲ EXTERNAL MESSAGE

Why is there a need to have the two briefs due on the same day? Not a very compelling reason for an extension.

Roland Tellis

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From: Heller, Nathan < Nathan. Heller@us.dlapiper.com>

Sent: Monday, February 17, 2025 7:34 AM

To: Roland Tellis <<u>rtellis@baronbudd.com</u>>; <u>dstellings@lchb.com</u> <<u>dstellings@lchb.com</u>> **Cc:** Goldberg, Matthew A. <Matthew.Goldberg@us.dlapiper.com>; Pfenninger, Timothy

<Timothy.Pfenninger@us.dlapiper.com>; Kizirian, Eric <eric.kizirian@lewisbrisbois.com>; Keramidas,

Mike <mike.keramidas@us.dlapiper.com>

Subject: ARC MDL -- JX Discovery Motion as to Porsche AG & BMW AG

Hi Roland and David,

I'm reaching out regarding Plaintiffs' motion for leave to take jurisdictional discovery as to Porsche AG in the ARC MDL. We would like to extend the opposition deadline (currently 2/21) by one week, to 2/28, so that the opposition to the motion is due on the same day as our reply in support of our motion to dismiss.

I have conferred with BMW's counsel, Eric Kizirian, and he requests the same extension on behalf of BMW as to the jurisdictional discovery motion against his client.

Could you please let me know whether Plaintiffs oppose this request?

Thanks very much,

Nate

Nathan P. Heller

Of Counsel

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